

REMARKS

INTRODUCTION:

Claims 1-21 are pending and under consideration.

REJECTION UNDER 35 U.S.C. §103:

Claims 1-21 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,603,853 to Mombo-Caristan.

Using independent claim 1 as an example, this claim recites "a servomotor is used as a driving source for moving said roller to press said roller on said plate portion in the plate thickness direction." Thus, the servomotor presses the roller in the plate thickness direction.

The Examiner admits that the cited reference does not teach a servomotor, but instead states that a servomotor is an obvious substitution. Applicants respectfully disagree.

The Examiner states that the cited reference teaches that "the rollers are driven." Office Action, page 3. However, the Examiner does not specify which direction the rollers are driven. The portions of the reference relied upon by the Examiner state "one or more rolls can be driven to urge the sheet toward the laser gun assembly 72." Mombo-Caristan, col. 15, ln. 16-17. This is a driving in a direction orthogonal to the plate thickness direction. Thus, the reference does not teach this claimed feature.

Furthermore, it is noted that not all structures to drive rollers in the plate thickness direction are equivalent. As set forth in the present Specification, coil springs and air cylinders have been used as driving mechanisms. Present Specification, page 2. However, these devices have disadvantages which are overcome by the use of servomotors. Thus, the use of a servomotor is not an obvious substitution of an equivalent structure, but is not obvious because of the advantages realized.

Accordingly, withdrawal of the rejection is requested.

CONCLUSION:

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this response, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: _____ By: _____
Michael J. Badagliacca
Registration No. 39,099

1201 New York Avenue, NW, Suite 700
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501